

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING



DAN WYANT

December 17, 2015

R05-16-A-036

Mr. Matthew Didier, Regional Brownfield Coordinator United States Environmental Protection Agency, Region 5 77 West Jackson Boulevard (Mail Code SE-7J) Chicago, Illinois 60604-3507

Dear Mr. Didier:

SUBJECT:

United States Environmental Protection Agency Brownfield Assessment

Grant Proposal

The Michigan Department of Environmental Quality (MDEQ) submits for consideration the enclosed Brownfield Assessment Grant Proposal to undertake environmental investigations at both hazardous substance and petroleum contaminated sites in rural Michigan communities.

It is the MDEQ's charge to protect the health of the residents of the state and evaluate the risks to the environment from brownfield sites. The brownfield assessment funds will enable the MDEQ to carry out this work in an efficient and effective manner, achieving both environmental and economic benefits in communities throughout the state. This grant will allow for the assessment, evaluation of risk, and development of cleanup alternatives on previously unfunded sites prior to their redevelopment.

Michigan's successful brownfield program is recognized for its unique liability protections for new purchasers of contaminated sites and innovative financial and tax incentive programs to support assessment, cleanup, and redevelopment efforts. The MDEQ's technical and administrative capacity will allow us to effectively implement the grant and ensure that sites are properly assessed in accordance with the grant requirements.

The MDEQ formally requests your review of this proposal and commits to accepting the grant, if awarded. We look forward to completing the grant activities and meeting the obligations of the state and the United States Environmental Protection Agency (USEPA) to protect the citizens and environment. Information required in the proposal guidelines is provided in the table below:

Applicant Identification:	Michigan Department of Environmental Quality 525 West Allegan Street, Constitution Hall Lansing, Michigan 48933
Applicant DUNS Number:	#92-932-7880
Funding Requested:	Assessment
Federal Funds Requested:	\$388,000
Contamination:	\$200,000 Hazardous and \$188,000 Petroleum, Community Wide

Location:	State of Michigan, focus on rural communities and communities that have not applied for or received USEPA funding for brownfields
Project Director:	Ronald Smedley: 517-284-5153, Fax: 517-284-5087 smedleyr@michigan.gov Michigan Department of Environmental Quality Remediation and Redevelopment Division 525 West Allegan Street, 5 th Floor South Lansing, Michigan 48933
Chief Executive:	Dan Wyant, Director, 517-284-6700 wyantd@michigan.gov Michigan Department of Environmental Quality Executive Division 525 West Allegan Street, 6 th Floor South Lansing, Michigan 48933
Date Submitted:	December 17, 2015
Project period:	Three years from Cooperative Agreement date (2016-2019)
Population:	State of Michigan - 9,884,133 Grant Focus: Rural counties with populations under 50,000 and municipalities with populations under 10,000
Other factors:	Checklist/Regional Priorities - enclosed

Should you have any questions relating to the programmatic aspects of this award, please contact the project director, Mr. Smedley. Financial questions should be addressed to Ms. Sharon Maher, Federal Aid, Administration Division, at mahers@michigan.gov or 517-284-5008.

Jim Sygo

Chief Deputy Director

517-284-6709

Enclosure

cc/enc: Ms. Sharon Maher, MDEQ

Mr. Robert Wagner, MDEQ Ms. Anastasia Lundy, MDEQ Ms. Carrie Geyer, MDEQ Mr. Ronald Smedley, MDEQ

Ms. Lisa Hoeh, MDEQ

Appendix 3- Assessment Other Factors Checklist

Name of Applicant: Michigan Department of Environmental Quality

Other Factor Page #

None of the Other Factors are applicable.

Community population is 10,000 or less.

Applicant is, or will assist, a federally recognized Indian tribe or United States territory.

Targeted brownfield sites are impacted by mine-scarred land.

Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.

Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.

Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties.

Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.

Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.

Narrative Proposal- Michigan Department of Environmental Quality

1. Community Need

a. Targeted Community and Brownfields

i. <u>Targeted Community Description</u>

The Michigan Department of Environmental Quality (MDEQ), with its partner state agencies, the Michigan Economic Development Corporation (MEDC), and the Michigan Land Bank Fast Track Authority (MLBFTA), will collaborate on a targeted assessment program. Targeted assessments are an effective and equitable way to ensure that brownfield sites in underserved communities are assessed. Twelve counties that have never received any United States Environmental Protection Agency (USEPA) brownfield funding have been prioritized for assessments. Hundreds of brownfield sites are located in these predominately rural areas. The MDEQ and its state and local partners such as brownfield redevelopment authorities, local land banks, regional economic development agencies, and local governments, will identify sites for environmental assessment. This approach empowers communities, in collaboration with state agencies, to nominate sites for assessment that are redevelopment priorities or public health risks. USEPA assessment funds will have a broad impact across the state.

Michigan's economy swings more positively and more negatively than the nation as a whole, due to our historic reliance on manufacturing. In this context, the last recession hit our state very hard. Thousands of former manufacturing facilities were vacated as production ceased, relocated to lower-cost regions, or left the country altogether. Transportation routes originally developed to move our consumer goods and workers are less-traveled, leaving abandoned former gas stations and repair garages. As the automotive industry right-sized its operations to meet lower demand, jobs that paid living wages to relatively lower-skilled workers have disappeared. From 2000 to 2009, Michigan lost 805,900 jobs, a 17.2 percent reduction. Unemployment reached a historic high of 14.9 percent in June of 2009, according to U.S. Bureau of Labor Statistics data.

Losing manufacturing jobs has an immediate and long term negative effect on local self-sufficiency. While Michigan's economy is recovering, prosperity has been slow to trickle down to our rural communities, many of which were built around one or two manufacturing facilities. Local finances remain strained by unemployment and reduced property values, compounding community instability. For example, the city of Jonesville (population 2,337), in Hillsdale County, experienced economic trauma as its largest employer, SKD Automotive, laid off over 300 of its 458 employees in 2008 and 2009. Hillsdale County experienced a 6.1 percent decline in the labor force in 2011. As industrial job losses are sustained, less money flows thorough the local economy, and Main Street businesses shut down. Although unemployment in Hillsdale County is now slightly below the state's average, its poverty rate remains higher than average as higher-wage industrial jobs are replaced with low-wage retail and service jobs.

¹ http://www.michigancapitolconfidential.com/20563

Although the state's industries created good-paying jobs, they left unregulated storage and seepage ponds, solid waste dumps, abandoned above and below ground storage tanks, and riverside landfills across the state. Small towns have not bounced back from the economic downturn as some of our larger communities have, and do not have the resources to address high-risk public health threats, or provide incentives to businesses to locate on brownfields.

The assessment grant program will facilitate redevelopment by reducing new purchasers' upfront investment in due diligence, removing the environmental stigma of properties, and quantifying the environmental remediation costs. The MDEQ will focus its USEPA assessment funding on rural communities such as Jonesville.

ii. Demographic Information

Demographics of counties that would be prioritized for assistance are listed in the table below. The bold and highlighted numbers indicate populations below 50,000, poverty rates above the national average, percentages of individuals receiving food stamp/supplemental nutrition assistance program (SNAP) benefits above the national average, median household incomes below the national average, and unemployment rates above the national average.

All 2013 American Community Survey (ACS) Data, U.S. Census, unless otherwise noted.

State and Counties, U.S. Census- unless otherwise noted	Population (2013 ACS 5- Year Population Estimate)	Poverty Rate	With Food Stamp/ SNAP Benefits	Median Household Income	Unemployment Rate, Michigan Unemployment (August 2015 Data, DTMB)
United States	311,536,594	15.4%	12.4%	\$ 53,046	5.2%
State of Michigan	9,886,095	<mark>16.8%</mark>	<mark>16.7%</mark>	<mark>\$ 48,411</mark>	5.2%
Benzie County	<mark>17,474</mark>	13.3%	<mark>12.9%</mark>	<mark>\$ 47,366</mark>	5.1%
Cass County	52,212	14.5%	<mark>14.2%</mark>	<mark>\$ 44,346</mark>	4.5%
Gladwin County	<mark>25,664</mark>	<mark>21.4%</mark>	<mark>18.4%</mark>	<mark>\$ 37,626</mark>	<mark>6.1%</mark>
Gogebic County	<mark>16,179</mark>	<mark>20.3%</mark>	<mark>17.9%</mark>	<mark>\$ 34,252</mark>	<mark>6.5%</mark>
Hillsdale County	<mark>46,463</mark>	<mark>19.7%</mark>	<mark>15.8%</mark>	<mark>\$ 41,759</mark>	4.9%
Iron County	<mark>11,723</mark>	14.2%	<mark>14.0%</mark>	<mark>\$ 34,685</mark>	<mark>5.9%</mark>
Lapeer County	88,323	11.0%	<mark>13.1%</mark>	<mark>\$ 52,939</mark>	<mark>6.7%</mark>
Menominee	<mark>23,917</mark>	13.6%	<mark>15.9%</mark>	<mark>\$ 41,739</mark>	4.9%
County					
Missaukee County	<mark>14,940</mark>	15.1%	<mark>18.3%</mark>	\$ 41,061	5.1%
Newaygo County	<mark>48,280</mark>	<mark>18.6%</mark>	<mark>21.8%</mark>	<mark>\$ 42,571</mark>	4.7%
Oceana County	<mark>26,456</mark>	<mark>19.9%</mark>	<mark>18.8%</mark>	\$ 40,02 <mark>3</mark>	<mark>5.6%</mark>
Wexford County	<mark>32,690</mark>	<mark>18.6%</mark>	<mark>19.8%</mark>	<mark>\$ 40,965</mark>	<mark>5.4%</mark>

Population data, Poverty rates, Food Stamp/SNAP Benefits, and Median Household Income is from the US Census, American FactFinder at: http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk Unemployment data as of September 2015, is from the State of Michigan, Department of Technology, Management and Budget (DTMB) at: http://www.michigan.gov/documents/dtmb/LMI-RegionalRelease-Sept2015-500893-7.pdf?20151009170320

iii. Description of Brownfields

Michigan has an estimated 10,236 known brownfields, including approximately 3,400 hazardous substances sites and 6,836 open leaking underground storage tank (LUST) sites. The number of potentially contaminated sites across the state is considerably higher as undiscovered or undisclosed contaminated sites are not included in the estimate.

Although the USEPA brownfield assessment grant may be used to conduct assessments at eligible sites statewide, we will focus on counties listed in the table below that have not received any USEPA assessment funding. These counties are impacted by both hazardous substances and petroleum sites. All of them are rural, most under 50,000 in population, although Lapeer has a larger population center than the others.

iv. <u>Cumulative Environmental Issues</u>

Environmental issues from brownfields can include groundwater contamination, vapor intrusion, contaminated soil, asbestos, lead paint, abandoned liquid wastes, and abandoned containers. One way we can measure the disproportionate impact of brownfields on our targeted communities is by looking at the number of people in each county for each

Counties	Number of Hazardous Substances Sites	Number of Petroleum Open LUST Sites	Population	Persons Per Site (Part 201 and Part 213)	Positive VOC samples 1983- 2002
Benzie County	27	15	17,474	416	2
Cass County	33	28	52,212	856	68
Gladwin County	23	33	25,664	458	11
Gogebic County	13	38	16,179	317	2
Hillsdale County	35	35	46,463	664	18
Iron County	20	16	11,723	326	0
Lapeer County	41	70	88,323	796	24
Menominee County	22	29	23,917	469	9
Missaukee County	17	15	14,940	467	10
Newaygo County	30	36	48,280	732	17
Oceana County	20	23	26,456	615	20
Wexford County	49	36	32,690	385	29
State of Michigan	3,400	6,836	9,886,095	966	NC

contaminated site. The table above shows that all 12 counties have fewer people per contaminated site than the statewide average. With fewer taxpayers per site, there are fewer local dollars available to address contaminated sites in our targeted communities.

Another concern in the targeted counties is the prevalence of old USTs, many of which have leaked, contaminating groundwater. Among our priority counties, the following have LUSTs that are impacting groundwater.

	LUST sites with	Total number
	impacted groundwater	of LUST sites
Iron County	16	16
Gladwin County	31	33
Lapeer County	68	70
Missaukee County	15	15
Oceana County	21	23
Newaygo County	33	36
Menominee County	29	29

In 2010, the MDEQ and the Environmental Justice Working Group analyzed disproportionate impacts of environmental contamination, laws, and enforcement on minority or low income Michigan residents. Their Environmental Justice Plan became the guideline for non-discriminatory treatment and meaningful involvement of Michigan residents for development, implementation, and enforcement of environmental laws, regulations, and policies by the state. Participating minority and low income community leaders emphasized the need for clean, safe, and healthy communities and neighborhoods, while encouraging new development and jobs. Community leaders' priorities align perfectly with our proposal to assess and clean up brownfield sites in order to prepare them for redevelopment.

b. Impacts on Targeted Community

Health effects from brownfield sites result from exposure to contaminated soil, asbestos, lead-based paint, and vapors from impacted soils and groundwater. Our targeted rural communities have known sources of contaminated groundwater that have affected neighboring property owners' wells. From 1983-2003 volatile organic compounds were found in water samples in each of our targeted counties, except Iron County. All of the targeted counties have residents who rely on private wells for drinking water.

Vacant, blighted buildings are an attractive nuisance and invite criminal activity. Communities must spend local resources to prevent crime and ensure the physical security at abandoned and deteriorating properties. As an example, an abandoned paper plant in Vicksburg, Michigan, the Fox River Paper Company was the scene of a criminal arson in 2012. The damage at the site will lead to the city having to demolish the section of the building that was set ablaze.

c. Financial Need

i. Economic Conditions

Michigan lost over 35% of its manufacturing jobs between 2000 and 2008, the largest percentage decline in the nation. Total jobs lost during that time period was estimated at nearly 490,000.³ Job losses began to reverse in 2011, and according to the state treasurer's estimates

² http://michigan.gov/deq/0,4561,7-135-3313 3675 3690-76500--,00.html

³http://www.mlive.com/annarbornews/business/index.ssf/2008/09/report michigan lost 315k manu.html.

of the state's economic situation, job growth is expected to continue at a slower rate through 2017. State budgets remain negatively affected by unemployment, slow growth, and reduced property taxes resulting from devalued property.

The MDEQ's ability to address contaminated properties and support redevelopment has consequently diminished due to declining resources. Over time, the MDEQ has received less general fund support from the legislature and cleanup and redevelopment bond funds have been used for assessment and risk reduction at contaminated sites throughout the state.

ii. Economic Effects of Brownfields

Community vitality is negatively impacted by brownfield sites. Blighted, functionally obsolete, abandoned and deteriorating properties may revert to state or local ownership under Michigan's tax reversion laws. In the absence of private owners, communities must spend local resources to address health and safety concerns at properties that return no tax income. Communities are caught in a cycle of inability to fund cleanups and blight elimination because they have limited economic development, and economic development is limited because they have blighted brownfield sites.

As median household incomes are influenced by the presence of large agricultural operations in rural counties, the poverty rate and the prevalence of SNAP benefits are a much more accurate depiction of the population in these rural communities. All 12 counties have higher rates of SNAP/food stamp benefits than the national rate of 12.4 percent.

2. Project Description and Feasibility of Success

a. Project Description, Timing, Site Selection

i. Project Description

The project will complement MDEQ's brownfield funding and staff resources. Thanks to progressive statutes providing liability protection for new purchasers, flexibility for liable parties to meet their obligations, and bond funding for environmental cleanup, the MDEQ's brownfield program is uniquely and expertly qualified to identify, assess, remediate, and assist with redevelopment obligations. For over 25 years, MDEQ staff have managed state-funded investigations and cleanups in nearly every one of Michigan's 83 counties, and provided direct grant and loan funding in 69 counties. The MDEQ has placed particular emphasis on knowing the communities we work in. Our staff are constantly on the lookout for new projects that will enhance communities and provide opportunities for our state's residents.

Our technical project managers, with expertise in engineering, vapor mitigation, toxicology, work plan development, contractor oversight, and cleanup project management, are housed in Lansing and field offices throughout the state. They are actively involved in cleanup decisions every day and have in-depth knowledge of site conditions. Our staff work with local officials

⁴ Administration Estimates Michigan Economic and Revenue Outlook, FY 2014-15, FY 2015-16 amd FY 2016-17, http://www.michigan.gov/documents/treasury/AdminTreasHandout 05152015 489386 7.pdf?20151027173001

and residents to help them understand environmental concerns in their communities and the effect contamination can have on public health and redevelopment potential.

The MDEQ brownfield redevelopment unit, where this project will be managed, has a staff of experienced program managers who work closely with and understand the needs of property owners, developers, and communities. Staff members have expertise in impacted real estate development, financing, insurance, placemaking, community engagement, and environmental health and are supported by MDEQ technical and administrative staff. The brownfield grant manager has over 17 years in environmental experience, and is a certified economic developer. He has successfully managed two assessment, two cleanup, and a revolving fund grant.

The MDEQ proposes a five-part approach using a USEPA site assessment grant to complement Michigan's existing financial and staff resources:

- 1. Prior to development of the scopes of work, project managers will contact local permitting agencies to determine whether permits are needed for rights-of-way and traffic control, and to secure site access.
- Phase 1 environmental site assessments (ESAs) will be conducted at eligible sites by MDEQ contractors. Investigations will be conducted according to All Appropriate Inquiry standards, following the ASTM 1527-13 procedure, and in accordance state guidelines.
- 3. Phase 2 ESAs will be conducted at sites with completed Phase 1 ESAs, or identified as a public health risk where the extent and sources of contamination have not been investigated. All sampling will be conducted following the MDEQ's Quality Assurance Project Plan, as approved by USEPA Region 5.
- 4. Baseline Environmental Assessments (BEAs) will be provided for prospective purchasers of the properties after completion of initial acquisition activities, such as purchase and development agreements. Under Michigan law, BEAs conducted within statutory timeframes establish liability protection for new owners or operators of contaminated property.
- 5. Due care obligations will be evaluated. An owner or operator of a contaminated property is obligated under Michigan law to prevent unacceptable exposures, not exacerbate contamination, and take other actions to protect public health, safety, and the environment. The MDEQ evaluations will identify owner obligations and estimate due care costs. This will facilitate redevelopment of brownfield sites by responsible individuals and ensure that due care compliance is conducted.

Once evaluated, projects may qualify for state-funded cleanup or brownfield redevelopment incentives. Brownfield staff, with our MEDC and MLBFTA colleagues, will help communities identify resources for further response actions or incentives for redevelopment, such as brownfield redevelopment grants or loans, or the use of tax increment financing.

ii. Project Timing

The assessment program will be initiated as soon as the cooperative agreement with the USEPA is completed. The MDEQ with our partners at the MEDC and MLBFTA have an outreach plan in place. We will contact brownfield redevelopment authorities or local governments in our

targeted counties within the first month of the grant period. The MDEQ will select one or more qualified environmental firms that have been vetted through the state's contracting process. All sites will be assigned to a contractor within two years of the cooperative agreement being completed. All reporting will be completed prior to the end of the three-year grant term.

iii. Site Selection

Communities and brownfield redevelopment authorities, working with MDEQ district project managers, will nominate sites. District project managers and the grant manager will prioritize eligible sites using the following selection criteria:

- Potentially serious environmental or public health conditions.
- Proximity to residences, private water supply systems, or wellhead protection areas.
- Waste products or storage tanks on the site.
- Whether buildings or other structures are a threat to public safety.
- Ability to access the site within a reasonable period of time.
- Potential or pending redevelopment of the property.
- Need in the community, based on the number of potentially eligible sites.

Sites with risks to public health, either through groundwater contamination or vapor intrusion, are higher priority, while sites with environmental impacts to surface water may be of slightly lower priority. Sites with non-migrating contamination, or contaminants that are not immediately impacting surrounding properties, are lowest priority.

b. Task Description and Budget Table

i. Task Descriptions

Under the \$200,000 Hazardous Substances grant, the MDEQ will conduct a minimum of:

- Seven Phase 1 environmental site assessments (ESAs) conducted according to All-Appropriate Inquiry and averaging \$5,000 each.
- Five Phase 2 ESAs that will average \$15,000 each.
- Five Baseline Environmental Assessments (BEAs) that will average \$5,000 each.
- Four due care evaluations and or cleanup plans averaging \$16,250 each.

Under the \$188,000 Petroleum grant, the MDEQ will conduct a minimum of:

- Eight Phase 1 ESAs conducted according to All-Appropriate Inquiry and averaging \$4,000 each.
- Six Phase 2 ESAs of petroleum-related substances, leading to development of cleanup plans. The Phase 2 assessments will average \$11,000 each.
- Six BEAs that will average \$5,000 each.
- Five due care compliance analyses that will average \$12,000 each.

The MDEQ annually evaluates state-funded cleanup sites to determine needs for the upcoming year. We analyze whether the selected remedy will reduce risks to human health and the environment, and whether increasing or decreasing the intensity of remediation will achieve the desired goals at the sites within a given period of time. We expect to evaluate the assessment properties in much the same way: determining the immediacy of the risk; likelihood

of exacerbation; possibility of requiring remediation; and opportunities for redevelopment.

ii. Budget Tables

Hazardous Substances Assessment Budget

Budget Categories	Task 1 Phase 1 Assessments (7)	Task 2 Phase 2 Assessments (5)	Task 3 Baseline Environmental Assessments (5)	Task 4 Due Care Evaluations and Cleanup Planning (4)	Total
Personnel					
Fringe Benefits					
Travel					
Equipment					
Supplies					
Contractual	\$35,000	\$75,000	\$25,000	\$65,000	\$200,000
Total	\$35,000	\$75,000	\$25,000	\$65,000	\$200,000

Petroleum Assessment Budget

Budget Categories	Task 1 Phase 1 Assessments (8)	Task 2 Phase 2 Assessments (6)	Task 3 Baseline Environmental Assessments (6)	Task 4 Due Care Evaluations and Cleanup Planning (5)	Total
Personnel					
Fringe Benefits					
Travel					
Equipment					
Supplies	_				
Contractual	\$32,000	\$66,000	\$30,000	\$60,000	\$188,000
Total	\$32,000	\$66,000	\$30,000	\$60,000	\$188,000

c. Ability to Leverage

After assessments are completed using the USEPA grant funds, the MDEQ has the ability to leverage state funding to undertake remediation at contaminated sites. State funding is available for further response activities when necessary and may include Clean Michigan Initiative, Surface Water Quality Improvement, and Refined Petroleum funds. State funding sources address redevelopment sites, contaminated sites, and petroleum LUST sites. Funding can be used for conducting feasibility studies, design and bid specifications, and cleanup/remediation and restoration activities. Brownfield grants, loans, tax increment financing, and MEDC economic development incentives may also be available for redevelopment projects.

This year the MDEQ funded cleanup at a former gas station in Grand Rapids. The property had been a service station from the late 1920's until the 1970s and a towing service until the 1980s. The USTs had been removed in 1987, but the site had soil and groundwater impacts. A release was reported by a new owner in November 2014. No liable party was identified. The developer had an aggressive schedule to clear and redevelop the site into a new commercial/residential building. Based on the developer's plans, the MDEQ removed 5,500 tons of contaminated soils at a cost of \$144,493, eliminating the need for a vapor barrier for the new structure. The MDEQ funding and development plans leveraged \$60,800 in state and local tax increment financing to address other environmental issues.

3. Community Engagement and Partnerships

a. Plan for Involving Targeted Community/Other Stakeholders and Communicating Progress i. Community Involvement Plan

Once grant funds are awarded, MDEQ staff and our partners in the MEDC and MLBFTA will reach out to local officials in targeted areas through email and personal communications.

Local officials and citizens can use MDEQ resources such as the Michigan Environmental Mapper (MEM) to identify contaminated sites in their area prior to meeting with our staff to select projects. The MEM includes over 18,000 hazardous substances impacted sites, LUST sites, and land and resource use restrictions within a searchable geographic information system (GIS) program. The program is on the MDEQ's website and is also available as a mobile application. One of the most useful aspects of the MEM is the ability to immediately download a portable data file (pdf) of any recorded restrictions.

The MDEQ's statewide outreach abilities will be used to communicate project progress to the public and our government partners.

- A web page listing grant-funded sites and their assessment status will be updated regularly.
 Phase 1 and 2 assessments will be made available for download. Although the State of Michigan primarily utilizes English, it has translated much of its web content to both Spanish and Arabic.
- Assessment sites will be added to the MEM so that users can find site-specific information.
- The MDEQ bi-weekly calendar, e-mailed to thousands of subscribers, will include updates.
- Signs at each site will direct residents to the website for more information about projects.
- Press releases will be issued when notable activities take place or milestones are met.
- MDEQ representatives will attend local public meetings to discuss the assessment process, results, and next steps in the redevelopment process.

Contact names, emails, and phone numbers for the district project manager and grant manager will be included on all public information.

b. Partnerships with Government Agencies

i. Local and State Environmental Authority

The MDEQ will retain oversight of grant funds and coordinate within the agency to ensure that outreach positions in our divisions, such as grant managers in water and waste management,

are informed of the availability of assessment grant funds, allowing them to integrate assessments with other projects. The grant manager will make a presentation about the grant to MDEQ multi-media specialists who coordinate work across all divisions at the individual district offices.

ii. Other Governmental Partnerships

The MDEQ is working closely with our partners at the MEDC and the MLBFTA. The MEDC offers redevelopment incentives including Community Development Block Grants, Community Revitalization Program grants, Redevelopment Ready Communities, and brownfield redevelopment tax increment financing authorization. The MEDC's Community Assistance Team members will help us identify eligible brownfield redevelopment projects in priority counties, and coordinate their incentives with our grant-funded projects when applicable.

The MLBFTA, which holds title to state tax-reverted properties, will be an indispensable partner. Staff of the MLBFTA will collaborate with local land banks in our priority communities to identify potential project sites. The MLBFTA provides access to the MDEQ for site assessment and cleanup activities, and will work with local land banks to gain access to properties they own. After remediation, the properties may be advertised for sale on the MLBFTA's website.

As needed to conduct assessments, market properties, clean up contaminated sites, or facilitate new development, other partners may include the Michigan Department of Transportation; Michigan State Housing Development Authority; Michigan Department of Natural Resources; Michigan Department of Community Health and Human Services; and the US Small Business Administration.

c. Partnerships with Community Organizations

i. Community Organization and Description and Role

Our grant project is designed to meet two goals: to facilitate redevelopment in underserved rural parts of the state; and to improve environmental quality and public health in economically-challenged communities. We will not achieve success in either of these goals without close relationships with local partners, including Brownfield Redevelopment Authorities; local and regional economic development and planning agencies and their local development networks; and environmental, neighborhood, and citizens' groups.

We will depend on our community partners to:

- Identify priority development sites;
- Facilitate public meetings for high-profile sites or projects;
- Inform and help their constituents understand the community impacts of brownfield redevelopment; and
- Provide public forums with opportunities for the public to request information or make suggestions regarding the need for specific sites to be assessed.

The MDEQ has worked with community groups on previous USEPA grants, including with an environmental working group in Detroit to foster information exchanges between community-

based organizations, the city of Detroit, and the MDEQ regarding LUST sites, and with the Neighbors of Belknap Lookout in Grand Rapids on cleanup of an abandoned plating facility. Once sites are assessed, the MDEQ will support local redevelopment initiatives, and ensure developers meet their due care obligations.

ii. Letters of Commitment

The DEQ is not involved with any specific local community organizations as the grant will be focused on 12 rural counties with the ability to be used statewide. However, our partner state organizations, the MLBFTA and the MEDC have extensive outreach capabilities to local economic development and community development organizations and they have committed to assist the MDEQ on promoting the program. Once sites are selected the MLBFTA and MEDC can help these local organizations facilitate redevelopment using other state incentives.

4. Project Benefits

a. Health and/or Welfare and Environment

i. Health and Welfare Benefits

The grant project will provide health and welfare benefits to the targeted communities by identifying public health risks at potential brownfield sites and determining the best methods of addressing those risks. The majority of proposed sites will have a history of hazardous substance or petroleum use, or potential for lead and or asbestos. These risks are often not known until an adequate Phase 1 ESA is conducted, which should lead to a high percentage of Phase 2 ESAs to determine the extent of contamination. The MDEQ may be able to utilize emergency cleanup funding to address substantial human health risks, such as removing abandoned containers, preventing trespass, abating friable asbestos, or providing alternative water supplies.

ii. Environmental Benefits

Immediate benefits include risk identification and quantification of due care obligations. Less contaminated sites may be immediately available for redevelopment. Those with greater contamination will be evaluated for further response activities or secured against trespass. State funds may be available to address underground storage tank (UST) removal, releases to surface water, threats to drinking water, and other risks to public health and the environment.

b. Environmental Benefits from Infrastructure and Reuse/Sustainable Reuse

i. Policies, Planning, and Other Tools

The DEQ has several policies and tools in place to encourage sustainability in our brownfield programs.

- MDEQ cleanup plans will use our greener cleanups strategy, which follows the ASTM Greener Cleanups guidelines and best management practices.
- Deconstruction practices are used whenever possible to keep demolition debris out of landfills. If demolition is undertaken as part of response activities, the MDEQ will follow its deconstruction policy. In subsequent redevelopment, the MDEQ will advise communities and developers on the availability of deconstruction information and associated cost savings and sustainability benefits.

- 3. MDEQ Brownfield staff are trained in placemaking. One of our staff is the MDEQ's department representative to statewide placemaking groups and initiatives. Placemaking assistance, including direction to additional funding sources, will be available to communities for projects with placemaking potential.
- Our environmental justice guidelines, discussed above in section 1.A.iv., will guide nondiscriminatory treatment and meaningful involvement of residents in our targeted communities.

ii. The MDEQ will integrate Equitable Development and Livability Principles

A successful brownfield redevelopment program by its nature integrates equitable development and livability principles as described by the Partnership for Sustainable Communities. For 25 years, the MDEQ's successful brownfield redevelopment program has supported large and small communities and neighborhoods with incentives that attract new development, create jobs, and result in opportunities that increase local economic competitiveness by reducing development costs.

Once blighted and vacant parcels are assessed, future environmental costs and potential restrictions are identified, and sites are made available for development, their potential for reuse increases. They are more attractive for new development that creates employment opportunities. A community's economic competitiveness increases when developers' costs and uncertainty is reduced. Communities and neighborhoods regain their vitality when blighted or vacant contaminated sites are returned to productive use. Reuse of brownfield sites allows available infrastructure to be utilized more efficiently.

c. Economic and Community Benefits

i. Economic and Other Benefits

The MDEQ will encourage local entities to market sites with redevelopment potential once they have been assessed. Marketing assistance can be provided by the MLBFTA and MEDC, whose web sites feature properties for sale. By selling the sites to private developers who can make property improvements and thereby increase the taxable valuation of the properties, the local economic conditions will be improved. Many of these sites will have little or no current value and generate minimal if any tax revenues. Once sites are assessed and cleanup plans are in place, the options for development are much greater.

Recently in the village of Byron, a prospective purchaser was interested in a former gas station site for his business. Because there was no environmental assessment of this former UST site, he was unable to quantify his potential due care obligations and the costs those would pose for his small business. The assessment grant would be able to remove those obstacles and unknowns.

ii. Job Creation Potential

The Michigan Works program will be provided information of upcoming development opportunities, including construction jobs. The MDEQ has lists of eligible environmental consultants and contractors that are able to bid on specific projects. The MDEQ will ensure,

through its contracts with these companies, that they will provide opportunities for local subcontractors, minorities, and women owned businesses. In some cases, the MDEQ can fund training for subcontractors to bring their employees into compliance with health, safety, and welfare requirements in order to work on specific projects.

5. Programmatic Capability and Past Performance

a. Programmatic Capability

The MDEQ has developed a streamlined and effective approach to managing USEPA brownfield grants. The MDEQ's organizational structure supports the administrative, legal and environmental requirements for brownfield redevelopment, including contractor selection, oversight, billing, invoice reviews, payments to contractors, technical and site knowledge, data analysis, and site closures. Technical, administrative and financial requirements of the grant project will be conducted completely in-house, by MDEQ employees.

<u>Financial Management:</u> The cleanup grant will be administered by the MDEQ's Federal Aid Office. The Remediation and Redevelopment Division will manage the grant and ensure that all grant requirements are followed. Financial management and oversight is conducted by a senior grants financial analyst who manages all federal grants, including the Part 128(a) grant, sitespecific Superfund grants, and the LUST grant.

<u>Contracting:</u> The MDEQ will follow its state contracting process which is in compliance with federal procurement regulations.

<u>Project Management and Technical:</u> The MDEQ will manage the grant and oversight of environmental professionals and contractors. The grant manager, Ronald Smedley, has over 15 years of experience in managing petroleum site assessment and cleanup projects, manages the federal 128a grant for the department and has managed five USEPA brownfield grants. Individual district project managers will have oversight of each property depending on its location. Our technical project management staff have expertise in hazardous substances and petroleum site remediation planning and implementation. The project managers will have primary authority over the site activities and ensure that all site-specific activities are conducted according to the cleanup plan and state regulations.

Using this collaborative approach, the MDEQ has implemented its other USEPA brownfield grants successfully over the years. Two recent grants for petroleum site cleanups, with a 20 percent match of state funds, were successfully used to remediate contaminated soils and remove abandoned USTs that were impeding reuse of former gas stations in the city of Detroit. These grants allowed the MDEQ to achieve closure of two LUST sites.

b. Audit Findings

The MDEQ is included in the State of Michigan Statewide Single Audit, which is completed annually. The most recent audit covered the period of October 1, 2013 through September 30, 2014 and was completed June 30, 2015. The audit included one major program managed by the MDEQ, Clean Water State Revolving Fund. The MDEQ was found to be in compliance with

the Federal Cash Management Improvement Act and had no material weaknesses related to internal control over federal programs. There were no findings related to the financial statements and financial schedules of federal programs. There were no questioned costs.

c. Past Performance and Accomplishments

i. Has Received an EPA Brownfield Grant

The MDEQ has received five USEPA brownfield grants. The grants are listed below with descriptions of our compliance with work plans, schedules, and terms and conditions of cooperative agreements. Our successful partnerships with state and local agencies are noted. The MDEQ achieved the expected results of each grant in a timely manner, and provided quarterly performance reports and Assessment, Cleanup and Redevelopment Exchange System (ACRES) reporting. Site conditions were accurately reflected in ACRES at the time of reporting.

2002 - USTfield Redevelopment Grant (#LP975970-01) from the Office of Underground Storage Tanks. The \$200,000 grant was awarded on July 9, 2003. The MDEQ funded site assessments and cleanups at two LUST sites in Kalamazoo and at four LUST sites in Detroit. All semi-annual project reporting and annual financial status reporting was up-to-date. The reports reflected the achievements expected for the grant. One site in Kalamazoo achieved a residential closure and now is used for single family housing. Two sites in Detroit were sold to private parties for commercial redevelopment. At closeout in 2005, \$17,802 was returned to USEPA thanks to strict cost controls and efficiencies in contractors' schedules, and proximity of the sites.

2003 - Brownfield Revolving Loan Fund Grant (#BF96522301), Cooperative Agreement signed October 24, 2003. A change in division management resulted in compliance with a revised grant work plan, revised schedule, and terms and conditions. Timely and accurate quarterly reports reflected the results expected for this grant, including developing a loan agreement, negotiating with potential applicants, and developing comprehensive cleanup work plans. Financial reports were also brought up-to-date in 2005 and were timely until the grant closeout. The property profile form was updated at the end of the grant period reflecting the status at that time. The grant allowed the MDEQ to create a loan program to clean up sites under redevelopment. One \$999,608 loan was made to our partners at the Berrien County Brownfield Redevelopment Authority in March 2007 for cleanup at a former foundry in Benton Harbor, leveraging an additional \$200,000 in local funding for the match and a \$1 million loan from the MDEQ for other activities. The remaining \$392 in grant funds were returned to the USEPA and the grant was closed out in January 2008. The site has been successfully redeveloped as a golf course and planned unit development. The Berrien County Brownfield Redevelopment Authority is repaying the loan under a 15-year reimbursement agreement.

2004 - Brownfield Assessment Grant (#BF965559-01), Cooperative Agreement signed October 15, 2004. The MDEQ received a Brownfield Site Assessment Grant to perform Phase 1 and Phase 2 Environmental Site Assessments and project completion reports at seven rural brownfield locations. A \$200,000 grant was used to assess six petroleum sites and a \$50,000 grant was used to assess one hazardous substances-contaminated site. Remaining funds in the amount of \$18,519 was returned to the USEPA at closeout in June 2007 due to effective project

oversight, contractor efficiencies, and proximity of locations. All quarterly reports were submitted on time in accordance with the Cooperative Agreement and reflected the achievement of the project expectations, including developing community contacts and support for the projects, providing information to the community about residual contamination and due care obligations, and helping further local redevelopment efforts. All financial reports were submitted accurately and on time until the grant closeout. Seven property profile forms were regularly updated including at the end of the grant period. This grant focused on assessing rural brownfield sites and leveraged \$647,000 in state funds to remove contaminated soil, groundwater, and USTs. Four grant-funded properties were purchased by private parties. Communities encouraged redevelopment, improved their taxable valuations, and protected their residents' drinking water.

2005 - Brownfield Cleanup Grant (#BF965926-01), Cooperative Agreement signed October 20, 2005. The MDEQ received \$200,000 to clean up a hazardous substance site, the former Hoff Industries plating facility in Grand Rapids, Michigan. The site had initially been assessed by the MDEQ's Brownfield Redevelopment Assessment program staff. The MDEQ developed a streamlined work scope and well-defined cleanup plan resulting in the project being completed under budget while protecting public health. The MDEQ returned \$37,153 to the USEPA upon grant closeout in August 2007. Cleanup activities took place in August and September 2006. All quarterly reports were submitted on time, and accurately described project achievements and results, including implementing neighborhood outreach, developing a public input process, and removing a hazardous building and contaminated soil. All financial reports were submitted accurately and on-time until the grant closeout. The property profile form was regularly updated including at the end of the grant. Additional state funding of \$47,000 was leveraged for this cleanup. The MDEQ and its state and local partners, the MLBFTA, city of Grand Rapids, and the Right Place, Inc. are marketing the sites for non-residential redevelopment.

2007 - Brownfield Cleanup Grants (#BF00E805-01), Cooperative Agreement was combined for two sites and signed January 21, 2009: pre-approved work began in October 2008. USEPA funds in the amount of \$220,000, and \$44,000 in matching state funds, were used for cleanup at petroleum-contaminated sites in Detroit. Strategic development of the scope of work and bid packages along with vigilant oversight of contractor expenses enabled the MDEQ to return \$46,196.85 to the USEPA. All quarterly reports including project updates and financial reporting were accurate and on-time, reflecting achievement of the results expected for the project. Achievements included a public notification and input process, removal of contaminated soil, removal of LUSTs, and creation of greenspace. Information about the sites was regularly updated in ACRES including at the end of the grant. On-site work was completed in October 2009 and the grant was closed out in June 2010. The MDEQ cleaned up these two sites after being awarded the grant later than other cooperative agreement recipients had been awarded. The MDEQ met all of the outputs in the work plan. The MDEQ is continuing to collaborate with the MLBFTA and the city of Detroit to market these properties and explore redevelopment opportunities.

III. C Threshold Criteria for Assessment Grants

1. Applicant Eligibility

The State of Michigan, Department of Environmental Quality is an eligible entity for an assessment grant, as the primacy agency for the State.

2. <u>Letter from State Authority</u>

Not Applicable as the MDEQ is the state authority.

3. <u>Community Involvement</u>

The Michigan Department of Environmental Quality (MDEQ) will inform and involve the community and other stakeholders during the planning, implementation, and brownfield assessment activities that are described in the proposal though the use of social media, such as Twitter posts, through the use of the department's website:

www.michigan.gov/deq, and the MDEQ Calendar, which is published on-line every two weeks. Additional outreach will be made specifically to the brownfield redevelopment authorities in those rural counties that have not received United States Environmental Protection Agency (USEPA) brownfield grants. The 12 target authorities will be contacted via an email list during the initial phase of site selection. As sites are analyzed for their appropriateness and to meet MDEQ and USEPA eligibility criteria, the MDEQ will contact individual community officials regarding the status of the sites. The public and other interested groups will be contacted through local media outlets and provided the opportunity to comment on proposed sites or the assessment activities themselves. MDEQ project managers will attend brownfield redevelopment authority meetings and local government legislative meetings to discuss individual projects when deemed relevant.

4. <u>Site Specific Eligibility Only</u>

Not Applicable.



State of Michigan Land Bank Fast Track Authority

December 8, 2015

Mr. Robert Wagner, Division Chief Remediation and Redevelopment Division Michigan Department of Environmental Quality Constitution Hall, 5th Floor South 525 West Allegan Street Lansing, Michigan 48933

Dear Mr. Wagner:

The Michigan Land Bank Fast Track Authority (Michigan Land Bank) is pleased to provide this letter of support for the Michigan Department of Environmental Quality's (DEQ) proposal for a United States Environmental Protection Agency (USEPA) Brownfield Assessment grant. This funding would be used to conduct environmental assessments primarily in rural communities that have limited resources to carry out their own assessments.

The grant funds, being available on a statewide basis will allow the DEQ to identify the highest needs from both an environmental standpoint and a redevelopment perspective. Communities will be able to request assessments for sites that they feel have either high risks to the public and the environment and/or that have redevelopment potential. The DEQ will be able to fund comprehensive assessments, including Phase 1 and Phase 2 environmental assessments, baseline environmental assessments, and documentation of due care compliance plans based on the specific needs at the sites. The ability of the DEQ to oversee the process and retain one or more consultants to undertake the work will ensure consistent and purposeful reports. These reports could then be utilized to undertake future cleanup activities, funded through one or more state funding programs, such as the Brownfield Grant and Loan program, or the Refined Petroleum Fund.

The Michigan Land Bank has the ability to address this opportunity to all 38 county land banks as well as the Michigan Association of Land Banks. The assessment funds will help further the goals of the Michigan Land Bank in assisting communities to eliminate blight or simply by assisting a prospective purchaser of tax reverted land bank property in identifying possible environmental concerns when purchasing property.

The State of Michigan will be economically stronger and will improve many economically challenged communities that will see the benefits of this funding.

On behalf of the Michigan Land Bank, I am conveying our strong support of the DEQ's USEPA grant proposal. It is our intent to work in full partnership with the DEQ to identify sites and promote the availability of this resource, particularly to communities that might not otherwise have the capacity to manage an assessment grant on their own. We are hopeful that these grant dollars will make Michigan stronger by attracting new investment and jobs for its citizens.

Sincerely,

Jeffrey M Huntington 'Senior Property Analyst



December 3, 2015

Mr. Robert Wagner **Division Chief** Remediation and Redevelopment Division Michigan Department of Environmental Quality Constitution Hall, 5th Floor South 525 West Allegan Street Lansing, Michigan 48933

Dear Mr. Wagner:

The Michigan Economic Development Corporation (MEDC) is pleased to provide this letter of support for the Michigan Department of Environmental Quality's proposal for a United States Environmental Protection Agency (USEPA) Brownfield Assessment grant. This funding would be used to conduct environmental assessments primarily in rural communities that have limited resources to carry out their own assessments.

The grant funds, being available on a statewide basis will allow the DEQ to identify the highest needs from both an environmental standpoint and a redevelopment perspective. Communities will be able to request assessments for sites that they feel have either high risks to the public and the environment and or that have redevelopment potential. The DEQ will be able to fund comprehensive assessments, including Phase 1 and Phase 2 environmental assessments, baseline environmental assessments, and documentation of due care compliance plans based on the specific needs at the sites. The ability of the DEQ to oversee the process and retain one or more consultants to undertake the work will ensure consistent and purposeful reports. These reports could then be utilized to undertake future cleanup activities, funded through one or more state funding programs, such as the Brownfield Grant and Loan program, or the Refined Petroleum Fund.

Through community outreach, MEDC's staff have the ability to discuss the availability of the funding in its meetings with community officials. The assessment funds will help further the goals of the MEDC in assisting communities eliminate blight, redevelop their downtowns, and create more vibrant and sustainable local economies.

The State of Michigan will be economically stronger and will improve many economically challenged communities that will see the benefits of this funding.

On behalf of the MEDC, I am conveying our strong support of the DEQ's USEPA grant proposal. It is our intent to work in full partnership with MDEQ to identify sites and promote the availability of this resource, particularly to communities that might not otherwise have the capacity to manage an

Mr. Robert Wagner December 3, 2015 Page 2

assessment grant on their own. We are hopeful that these grant dollars will make Michigan stronger by attracting new investment and jobs for its citizens.

Sincerely,

DocuSigned by:

Steven Arwood

Michigan Economic Development Corporation

President and CEO

OMB Number: 4040-0004 Expiration Date: 8/31/2016

Application for Federal Assista	ance SF-424				
* 1. Type of Submission: Preapplication	* 2. Type of Application: * New	If Revision, select appropriate letter(s):			
Application	Continuation *	Other (Specify):			
Changed/Corrected Application	Revision				
* 3. Date Received:	4. Applicant Identifier:				
12/17/2015					
5a. Federal Entity Identifier:		5b. Federal Award Identifier:			
State Use Only:					
6. Date Received by State:	7. State Application I	dentifier:			
8. APPLICANT INFORMATION:					
*a.Legal Name: Michigan Depart	tment of Environmental	Quality			
* b. Employer/Taxpayer Identification Nu	mber (EIN/TIN):	* c. Organizational DUNS:			
38-6000134		9293278800000			
d. Address:					
* Street1: P.O. Box 3047	73, 525 West Allegan St	treet			
Street2:					
* City: Lansing					
County/Parish:					
* State:		MI: Michigan			
Province:					
* Country:		USA: UNITED STATES			
* Zip / Postal Code: 48909-7973					
e. Organizational Unit:					
Department Name:		Division Name:			
MI Dept of Environ. Quality		Remediation and Redevelopment			
f. Name and contact information of p	person to be contacted on ma	atters involving this application:			
Prefix: Ms.	* First Name:	Sharon			
Middle Name:					
* Last Name: Maher					
Suffix:					
Title: Federal Aid Coordinator					
Organizational Affiliation:					
Michigan Department of Envir	Michigan Department of Environmental Quality				
* Telephone Number: 517-284-5008	3	Fax Number: 517-241-7428			
* Email: mahers@michigan.gov					

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
A: State Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Environmental Protection Agency
11. Catalog of Federal Domestic Assistance Number:
66.818
CFDA Title:
Brownfields Assessment and Cleanup Cooperative Agreements
* 12. Funding Opportunity Number:
EPA-OSWER-OBLR-15-04
* Title:
FY16 Guidelines for Brownfields Assessment Grants
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
This is a Community-Wide Brownfield Assessment grant for sites with potential contamination of hazardous substances and petroleum contamination.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

	r Federal Assistance SF-424	
16. Congressiona	al Districts Of:	
* a. Applicant	MI-008	* b. Program/Project MI-008
Attach an additiona	I list of Program/Project Congressional Distri	icts if needed.
		Add Attachment Delete Attachment View Attachment
17. Proposed Pro	ject:	
* a. Start Date: 0	7/01/2016	* b. End Date: 06/30/2019
18. Estimated Fu	nding (\$):	
* a. Federal	388,000.00	
* b. Applicant	0.00	
* c. State	0.00	
* d. Local	0.00	
* e. Other	0.00	
* f. Program Incom	0.00	
* g. TOTAL	388,000.00	
* 19. Is Application	on Subject to Review By State Under Exe	ecutive Order 12372 Process?
a. This applic	ation was made available to the State und	der the Executive Order 12372 Process for review on 12/17/2015.
b. Program is	subject to E.O. 12372 but has not been s	selected by the State for review.
c. Program is	not covered by E.O. 12372.	
* 20. Is the Applic	ant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
Yes	⊠ No	
If "Yes", provide explanation and attach		
	explanation and attach	
	explanation and attach	Add Attachment Delete Attachment View Attachment
21. *By signing therein are true, comply with any subject me to cri	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties.	nents contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may
21. *By signing therein are true, comply with any subject me to cri	nis application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties.	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001)
21. *By signing therein are true, comply with any subject me to cri	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties. (ications and assurances, or an internet site ications.)	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001)
21. *By signing therein are true, comply with any subject me to crit. ** I AGREE ** The list of certif specific instructions Authorized Representations	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties. (ications and assurances, or an internet site ications.)	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001) where you may obtain this list, is contained in the announcement or agency
21. *By signing therein are true, comply with any subject me to cri. ** I AGREE ** The list of certif specific instructions Authorized Representations Authorized Representations Ms Middle Name:	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties. (ications and assurances, or an internet site ications.)	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001) where you may obtain this list, is contained in the announcement or agency
21. *By signing therein are true, comply with any subject me to cri. ** I AGREE ** The list of certif specific instructions Authorized Representations Authorized Representations Ms Middle Name:	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties. (ications and assurances, or an internet site ications.)	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001) where you may obtain this list, is contained in the announcement or agency
21. *By signing therein are true, comply with any subject me to cri ** I AGREE ** The list of certif specific instructions Authorized Repres Prefix: Ms Middle Name: Ma Suffix: Mane: Ma	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties. (ications and assurances, or an internet site ications.)	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001) where you may obtain this list, is contained in the announcement or agency
21. *By signing therein are true, comply with any subject me to cri ** I AGREE ** The list of certific instructions Authorized Representations Authorized Representation in the complete in the certific instructions ** Last Name: Massuffix: Massuffix: Federal in the complete in the	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I an minal, civil, or administrative penalties. (ications and assurances, or an internet site ications.) esentative: . *Fi	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a aware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001) where you may obtain this list, is contained in the announcement or agency
21. *By signing therein are true, comply with any subject me to cri ** I AGREE ** The list of certif specific instructions Authorized Repres Prefix: Ms Middle Name: Ma Suffix: * Title: Fede * Telephone Numb	his application, I certify (1) to the stater complete and accurate to the best of resulting terms if I accept an award. I amminal, civil, or administrative penalties. (ications and assurances, or an internet site ications.) esentative: . *Fi ther Tal Aid Coordinator	ments contained in the list of certifications** and (2) that the statements my knowledge. I also provide the required assurances** and agree to a ware that any false, fictitious, or fraudulent statements or claims may (U.S. Code, Title 218, Section 1001) The where you may obtain this list, is contained in the announcement or agency The statements of the statements or claims may (U.S. Code, Title 218, Section 1001) The statements of the statements or claims may (U.S. Code, Title 218, Section 1001)